

Case Name: Lorena Dominguez v. USACase Number: 1:23CV - 07908 (        ) (PK)**PROPOSED DISCOVERY PLAN/SCHEDULING ORDER**

	DONE	NOT APPLICABLE	DATE
<b>A. ACTIONS REQUIRED <i>BEFORE</i> THE INITIAL CONFERENCE</b>			
1. Rule 26(f) Conference held	XX		
2. Rule 26(a)(1) disclosures exchanged	XX		
3. Requested:			
a. Medical records authorization	XX		
b. Section 160.50 releases for arrest records		XX	
c. Identification of John Doe/Jane Doe defendants		XX	
4. Procedures for producing Electronically Stored Information (ESI) discussed		XX	
5. Confidentiality Order to be submitted for court approval (see Standing Confidentiality Order on the Chambers website)			11/11/2024
<b>B. SETTLEMENT PLAN</b>			
1. Plaintiff to make settlement demand	XX		
2. Defendant to make settlement offer			2/3/2025
3. Referral to EDNY mediation program pursuant to Local Rule 83.8? (If yes, enter date for mediation to be completed)		XX	
4. Settlement Conference (proposed date)			3/3/2025
<b>C. PROPOSED DEADLINES</b>			
1. Motion to join new parties or amend pleadings		XX	
2. Initial documents requests and interrogatories		DONE	
3. All fact discovery to be completed (including disclosure of medical records)		DONE	
4. Joint status report certifying close of fact discovery and indicating whether expert discovery is needed		DONE	

5. Expert discovery (only if needed)		<i>Check here if not applicable</i> <input checked="" type="checkbox"/>	
Plaintiff expert proposed field(s) of expertise:	Various treating medical experts, life care planner, economist, and reserve rights to others		
Defendant expert proposed field(s) of expertise:	Medical and accident reconstruction experts and reserves right to identify others		
	<b>DONE</b>	<b>NOT APPLICABLE</b>	<b>DATE</b>
a. Affirmative expert reports due			1/13/25
b. Rebuttal expert reports due			2/11/25
c. Depositions of experts to be completed			3/28/25
6. Completion of ALL DISCOVERY (if different from C.3)			04/01/25
7. Joint status report certifying close of ALL DISCOVERY and indicating whether dispositive motion is anticipated			04/23/2025
8. If any party seeks a <b>dispositive motion</b> , date to (a) file request for pre-motion conference (if required), or (b) file briefing schedule for the motion			04/23/2025
9. Proposed Joint Pre-Trial Order due (if no dispositive motion filed)			05/08/2025
<b>D. CONSENT TO MAGISTRATE JUDGE JURISDICTION</b>			
1. All parties consent to Magistrate Judge jurisdiction for dispositive motion?			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
2. All parties consent to Magistrate Judge jurisdiction for trial?			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
<b>E. COLLECTIVE ACTION AND CLASS ACTION MOTIONS ONLY</b>			
1. Motion for collective action certification in FLSA cases			
a. Response due			
b. Reply due			
2. Motion for Rule 23 class certification			
a. Response due			
b. Reply due			

**This Scheduling Order may be altered or amended only upon a showing of good cause based on circumstances not foreseeable as of the date of this order.**

SO ORDERED:

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**PEGGY KUO**  
 United States Magistrate Judge

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 Date